

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES)	
)	Case No. 17 CR 495
v.)	
)	Judge Andrea R. Wood
ROBERT O'ROURKE)	

**DEFENDANT'S UNOPPOSED MOTION FOR
SHORT EXTENSION OF TIME TO FILE SENTENCING MEMORANDUM**

Defendant, Robert O'Rourke ("Mr. O'Rourke"), by and through his counsel, Kulwin, Masciopinto & Kulwin, LLP, respectfully moves this Honorable Court, with no objection from the Government, for entry of an Order granting Mr. O'Rourke's motion to extend the time to file his Sentencing Memorandum from July 31, 2019 to August 2, 2019. In support of this motion, Mr. O'Rourke states as follows:

1. On February 25, 2019, the jury returned a verdict of guilty against Mr. O'Rourke on 10 of the 26 counts charged in the indictment. Dkt. No. 112. Mr. O'Rourke is scheduled to be sentenced by the Court on August 16, 2019. Dkt. No. 145.

2. On or about June 19, 2019, defense counsel received the Presentence Investigation Report and Sentencing Recommendation, which, combined total nearly 50 pages. On July 24, 2019, the government filed its 30-page Sentencing Memorandum. Dkt. No. 146.

3. Counsel has been working diligently to complete Mr. O'Rourke's Sentencing Memorandum, however, due to the press of other obligations and the complexity of sentencing issued to be raised, counsel will be unable to file Mr. O'Rourke's Sentencing Memorandum by July 31, 2019. As such, Mr. O'Rourke requests a short extension of time in order to adequately address all the necessary sentencing considerations.

4. Defense counsel has conferred with the government and there is no objection to this motion.

WHEREFORE, Defendant Robert O'Rourke respectfully moves this Honorable Court to grant this unopposed motion and extend the time for Mr. O'Rourke to file his Sentencing Memorandum from July 31, 2019 to August 2, 2019.

Respectfully Submitted,

KULWIN, MASCIOPINTO & KULWIN, LLP

By: /s/ Rachel A. Katz
One of Defendant's Attorneys

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CERTIFICATE OF SERVICE

I, Rachel A. Katz, an attorney, hereby certify that the above *Defendant's Unopposed Motion for Short Extension of Time to File Sentencing Memorandum* was served upon all counsel of record via ECF Filing on July 29, 2019.

By: /s/ Rachel A. Katz
One of Defendant's Attorneys